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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

OMAR STRATMAN,	)	
	)	
Plaintiff,	)	
	)	Case No. A02-0290 CV (JKS)
versus	)	
	)	
LEISNOI, INC., KONIAG, INC., and	)	LEISNOI, INC.'S MOTION FOR
DIRK KEMPTHORNE, SECRETARY OF	)	AWARD OF ATTORNEYS FEES
THE INTERIOR,	)	
	)	
Defendants.	)	
	)	

COMES NOW, LEISNOI, INC., through counsel, Morrison Mahoney LLP, and, pursuant to Federal Rule of Civil Procedure 54(d)(2), Local Rule 54.3, and the bad-faith on the part of the losing party exception to the American Rule recognized by the United States Supreme Court in *Alyeska Pipeline Service Co. v. Wilderness Society*, 421 U.S., 240 (1975), hereby moves for an award of ONE MILLION DOLLARS in attorneys fees.

DATED this 10<sup>th</sup> day of October, 2007.

RESPECTFULLY SUBMITTED,

/s/ John Richard Fitzgerald  
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**CERTIFICATE OF SERVICE**

I hereby certify that on October 10, 2007 a copy of the foregoing was served electronically upon Collin Middleton, Esq., Dean Dunsmore, Esq., and Michael Schneider, Esq.

/s/ John Richard Fitzgerald